



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Inspection Date 8/11/2006

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT**GENERATOR****S Q GENERATOR**

Haz: 1556128
Res: 1556130

Company name Dupont AutomotiveEPA I.D. Number PAD002311884

Employer I.D. Number (EIN) _____

Site Address 3401 Grays Ferry AvenueCounty PhiladelphiaMunicipality PhiladelphiaZip 19146Name of Inspector Laura JohnsonName & Title of Responsible Official John Weldon, Environmental CoordinatorPerson Interviewed John Weldon, Larry LorenziTelephone (215) 539-6629Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: 80000 Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Dupont Co IncLicense Number NJD002385730Transporter Name Marisol IncLicense Number NJD002464544Transporter Name SJ Transportation IncLicense Number NJ0071629976**4. Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
F005	Waste Flammable Liquid	Marisol Inc-NJ002454544
		125 Factory Lane
		Middlesex, NJ 08846
F003	Waste Combustible Liquid	EI Dupont Co Inc
		Chambers Works WWTP
		Deepwater, NJ 08023
D008	Waste Hazardous Solids	CWM Chem Services LLC
		1559 Balmer Rd
		Model City, NJ 11107

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont Automotive ID Number PAD002311884 Date 8/11/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Dupont Automotive ID Number PAD002311884 Date 8/11/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884Site Name: Dupont-Marshall LabsAddress: 3401 Grays Ferry AveTelephone #: 215-539-6629Operator Name: sameAddress: sameMunicipality: PhiladelphiaResponsible Official: John WeldonPerson Interviewed: sameInspector: Laura JohnsoneFACTS ID #: PF _____ SF _____County: PhiladelphiaTitle: Environmental Coordinator

Title: _____

Title: Environmental TraineeInspection Date: 8 / 11 / 2006 Type: Routine No. of Violations: 0 Time: 10 amWaste Description: Lab Trash Waste Code: R710Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: Empty Metal Containers Waste Code: R419Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: Waste Water Waste Code: R999Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: Waste Water Waste Code: R306Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

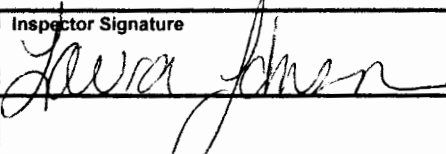
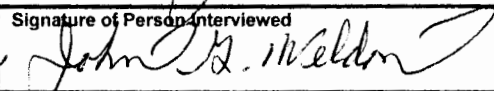
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Department of Environmental Protection		GENERAL INSPECTION REPORT		Bureau of Land Recycling and Waste Management	
Type of Inspection	WM Identification Number	Entry Time/Date		Exit Time/Date	
Routine	PAD002311884	8/9/2006		8/11/2006	
Facility/Incident Name and Location				Municipality	
Dupont Labs 3401 Grays Ferry Ave 19146				Philadelphia	
				County	
				Philadelphia	
Name, Address of Responsible Official			Title		
John Weldon			Environmental Coordinator		
			Telephone		Interviewed
			215-539-6629		Yes <input type="checkbox"/> No <input type="checkbox"/>
REMARKS:					

A large quantity hazardous waste and residual waste inspection of Dupont Automotive-Marshall Labs took place on August 9, 2006 by Laura Johnson from the Department of Environmental Protection. The facility guide for the inspection was Larry Lorenzoni, Safety Coordinator.

The inspection began with the process engineering area, which is located in buildings 192 and 66. These building have several satellite accumulation areas, which were inspected. In building 192 the satellite accumulation on the first floor was observed. In this area there was a residual waste drum, an aqueous waste drum, a non-aqueous waste drum and a flammable waste drum. All of the drums appeared to be labeled correctly and were all closed at the time of the inspection. Building 66 was also observed and all of the drums were also correctly labeled and closed during the time of this inspection.

The inspection continued with a tour of the 250 Building in which the 90-day hazardous waste storage area is. This is the building where flammable products are also stored. The hazardous waste storage area is labeled and everything is kept clean and accessible. All of the drums observed appeared to be labeled correctly and dated. The earliest date that was seen was 6/20/2006 which is within the 90-day storage requirements. In this area the weekly inspection log for the hazardous waste was also observed. The log

Inspector Name	Inspector Signature	Headquarters	Date
Laura Johnson		2 East Main Street.	8/11/06
		Norristown, PA 19401	Telephone
			484-250-5762
Person Interviewed Name	Signature of Person Interviewed	Title	Telephone
John G. Weldon		Env. Coordinator	

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
Facility/Incident Name and Location Dupont Automotive		Municipality Philadelphia
3401 Grays Ferry Ave		County Philadelphia 19146

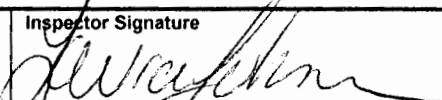
appears to be thoroughly kept and has been completed every week since 1/3/2006. Overall all of the drums in the storage area appear to be well maintained, labeled and closed.

The next area that was observed were some of the labs in the Main Lab Building 227. Three of the labs were observed. The main satellite accumulation areas in these labs come from parts washers, which were observed to be closed. In some of the parts washers there is a waste bucket which was observed to be labeled as hazardous waste and were closed. Again this area seems to be well maintained and clean.

Lastly the records review took place on August 11, 2006. The records could not be accessed during the normal inspection due to the fact that John Weldon the Environmental Coordinator was not on site. The training records were first observed, these records appear to be thoroughly completed and up to date. The PPC plan was also observed, it was asked that the Department's contact information be updated to indicate the new phone number. The number was written in temporarily and will be permanently updated in the plan. The manifests for the 1st and 3rd quarter of 2005 and the 1st quarter of 2006 were observed. All of the manifests appear to be completed correctly and routed within the proper time limits. The residual waste manifests and bills of lading were also observed to be completed correctly. The Biennial reports for the hazardous waste and residual waste were also available and were reviewed. In 2005 the total amount of hazardous waste produced by the facility was 960,161 lbs. The residual waste 25R's and 26R's were available and were reviewed. These both appear to be completed correctly and thoroughly. Additionally, the hazardous waste storage weekly inspection logs for 2003-2005 were also reviewed and are all completed as they should be.

A copy of this inspection report will be reviewed and left with the facility.

No violations as a result of this inspection.

Inspector Name Laura Johnson	Inspector Signature 	Date 8/11/2006
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/2/04
Time Start 1:30 pm
Time Finish 4:00 pm

HAZARDOUS WASTE INSPECTION REPORT


GENERATOR

S Q GENERATOR

Company name Dupont Automotive I.D. Number PAD002311884
Site Address 3401 Grays Ferry Avenue
County Philadelphia Municipality Philadelphia Zip 19146
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official John Weldon, Environmental Coordinator
Person Interviewed John Weldon and Shawn Smith Telephone (215) 539-6629
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: ~100,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types Fluorescent Tubes, Lead-Acid Batteries

3. Hazardous Waste Transporters:

Transporter Name Marisol License Number NJD002454544
Transporter Name Dupont, Experimental Station License Number DED003930807
Transporter Name Dupont Co, Inc License Number NJD002385730

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005, D001	Toluene, Xylene	E.I. Dupont Co. Inc.
D001, D035	Tetrahydrofuran	Rt 141 Experimental Station
D001, D002	Sodium Metabisulfite, Acrylic Acid	Wilmington, DE 19880
F003, F005, D035	Hazardous Waste Liquid (Aqueous)	DED003930807
D002	Potassium Hydroxide	Marisol Inc.
D002	Methacrylic Acid	125 Factory Lane
D001	Waste Resin Solution	Middlesex, NJ 08846
D005	Barium Sulfate	NJD002454544

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont Automotive ID Number PAD0002311884 Date November 3, 2004

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Dupont Automotive ID Number PAD002311884 Date November 3, 2004

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, November 3, 2004

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity residual waste and a large quantity hazardous waste inspection. Present from the facility was John Weldon, Environmental Coordinator and Shawn Smith, Manager of Safety, Health and Environmental.

The inspection began with the process engineering area, which is located in buildings 192 and 66. These areas have wastes within satellite accumulation. There was construction going on in these areas at the time of the inspection. The first floors of each building had 4 drums of waste, including contaminated lab trash (residual waste), flammable solids, aqueous and non-aqueous hazardous waste. The second floors of each building had only 3 drums of hazardous waste; no residual waste was being stored here. All drums were closed and properly labeled.

Outside, there is a bermed area where totes of non-hazardous inks are stored. They are stored in 1 cubic yard totes and are normally taken out of the facility by tanker truck. There were 14 totes being stored here at the time of the inspection. All appeared to be labeled and none appeared to be leaking.

The inspection continued with a tour of Building 250. This building stores most of the facility's hazardous and residual wastes. The wastes include solvents, lab packs, contaminated lab trash, RCRA empty containers and universal wastes. This area was preparing for a shipment to Dupont's Experimental Station in Delaware, though the facility had just had a pickup from Marisol earlier in the week. According to Mr. Weldon, this facility has been very busy, such that waste generation has been increased. The drums and lab packs are normally stored on racked shelving. At the time of the inspection, the waste was being stored on the floor because of the early morning pickup the next day. The hazardous wastes were all closed and labeled with the words "hazardous waste". There were a couple of containers that did not have an accumulation date on them. Mr. Weldon stated that the wastes are coming down to this area so quickly from the satellite area that the facility had little time to put the date on them. Mr. Weldon also explained that those drums had just been brought down to the area that morning. The facility is reminded that once containers in satellite accumulation are full, they are to be dated and within three days brought to the 90-day storage area. The oldest accumulation date seen on any of the drums was October 1, 2004. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump, which lets out into an enclosed containment area should there ever be any spills in this building. The building is also equipped with overhead sprinklers and foam releasing equipment. The residual wastes are stored in wranglers (1 cubic yard containers) and drums. These were all labeled non-hazardous wastes. The facility has also installed flammable storage cabinets to hold lab-pack wastes. These closets are being stored on the lower level or the racked shelving. There were no universal wastes observed being stored at the time of the inspection.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's that are going to Marisol and the Experimental Station are kept with each manifested shipment. The non-hazardous manifests were also

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) copy mailed to facility Date 11/5/04

Inspector Signature Aleta L. Finney Date 11/5/04

File name: Dupont (rpt)

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs
Identification Number: PAD002311884
Date of Inspection: Wednesday, November 3, 2004

made available and wastes properly tracked. The PPC plan was in order but due to some recent retirements, the plan needs some personnel updates and an update to the PADEP phone number (484-250-5900). The source reduction strategy for both the residual and hazardous wastes were also made available. Both of these reports should be updated by March 2005. The residual and hazardous waste biennial reports were also completed. The hazardous and residual waste inspection logs were also made available and appeared to be completed weekly. The hazardous waste personnel training records were also available for review. Mr. Weldon just finished the RCRA training before I arrived for my inspection on November 3, 2004.

No violations were cited.

The results of this inspection were reviewed with Mr. Weldon and Mr. Smith before leaving the facility. A copy of this report was sent to Mr. Smith on November 5, 2004.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) copy mailed to facility Date 11/5/04
Inspector Signature Aleta L. Finney Date 11/5/04
File name: Dupont (rpt) Page 7 of 7



Fix(haz) = 1272895
 Fix(Lres) = 1272897
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 9/24/03
 Time Start 1:30 pm
 Time Finish 3:30 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ **GENERATOR**

 ☐ **S Q GENERATOR**

Company name Dupont Automotive I.D. Number PAD002311884

Site Address 3401 Grays Ferry Avenue

County Philadelphia Municipality Philadelphia Zip _____

Name of Inspector Aleta L. Finney

Name & Title of Responsible Official John Weldon, Environmental Coordinator

Person Interviewed Same Telephone (215) 539-6629

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: ~100,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types Fluorescent Tubes, Lead-Acid Batteries

3. Hazardous Waste Transporters:

Transporter Name Marisol License Number NJD002454544

Transporter Name Dupont, Experimental Station License Number DED003930807

Transporter Name Dupont Co, Inc License Number NJD002385730

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005, D001	Toluene, Xylene	E.I. Dupont Co. Inc.
D001, D035	Tetrahydrofuran	Rt 141 Experimental Station
D001, D002	Sodium Metabisulfite, Acrylic Acid	Wilmington, DE 19880
F003, F005, D035	Hazardous Waste Liquid (Aqueous	DED003930807
D002	Potassium Hydroxide	Marisol Inc.
D002	Methacrylic Acid	125 Factory Lane
D001	Waste Resin Solution	Middlesex, NJ 08846
D005	Barium Sulfate	NJD002454544

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont Automotive ID Number PAD0002311884 Date September 24, 2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Dupont Automotive ID Number PAD002311884 Date September 24, 2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884Telephone #: 215-539-6629Site Name: Dupont - Marshall LabsOperator Name: sameAddress: 3500 Grays Ferry AvenueAddress: samePhiladelphia, PA 19146Municipality: PhiladelphiaCounty: PhiladelphiaResponsible Official: John WeldonTitle: Environmental CoordinatorPerson Interviewed: John WeldonTitle: Environmental CoordinatorInspector: Aleta L. FinneyTitle: Solid Waste Specialist

eFACTS ID #: PF _____ SF _____

Inspection Date: 9/24/2003 Type: routine (1) No. of Violations: 0 Time: 2 pmWaste Description: Industrial Wastewater Waste Code: R999Treatment: ☐ Yes ☒ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility POTW-Southwest Water Pollution Control PlantLocation: Philadelphia Type: _____Amount Generated: 307 tons lb./mo.Waste Description: Contaminated lab trash Waste Code: R710Treatment: ☐ Yes ☒ No Type: _____Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility Experimental Station-DupontLocation: Wilmington, DE Type: TSDAmount Generated: 58 tons lb./mo.Waste Description: RCRA Empty Metal Cans Waste Code: R419Treatment: ☐ Yes ☒ No Type: _____Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ ImpoundmentsDisposition: Destination Facility Experimental Station-DupontLocation: Wilmington, DE Type: TSDAmount Generated: 38 tons lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Site Name	Dupont Coordinator
ID Number	PAD002311884
Date	September 24, 2003

INSPECTION REPORT – RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

[illegible]

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, September 24, 2003

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity residual waste and a large quantity hazardous waste inspection. Present from the facility was John Weldon, Environmental Coordinator and Bill Gillan, Manager of Safety, Health and Environmental.

The inspection began with the process engineering area, which is located in building 192 and 66. This area has several types of satellite accumulation areas. Building 192 has two accumulation areas-one on each floor of the building. There were four drums on the lower floor and three drums on the upper floor. Building 66 also has two accumulation areas on an upper and lower floor. The drums contained residual waste, aqueous waste, non-aqueous waste and flammable waste containing solids. All drums were closed and properly labeled.

The inspection continued with a tour of Building 250. This building stores the facility's hazardous and residual wastes. The wastes include solvents, lab packs, contaminated lab trash, RCRA empty containers and universal wastes. This area was pretty empty at the time of the inspection. Mr. Weldon stated that the facility just had a pickup earlier in the week. The drums and lab packs are stored on racked shelving and were inspected. They were all closed and labeled properly with the accumulation date, generator information and the words "hazardous waste". The oldest accumulation date seen on any of the drums was August 20, 2003. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump, which lets out into an enclosed containment area should there ever be any spills in this building. The building is also equipped with overhead sprinklers and foam releasing equipment. According to both Mr. Gillan and Mr. Weldon, the facility has never had to put this equipment into practice, as there have never been any spills at the facility. The residual wastes are stored in wranglers (1 cubic yard containers) and drums. These were all labeled non-hazardous wastes. The facility also had 3 packages of fluorescent tubing that were properly packaged. It is recommended that the facility also put labels on these packages stating that they are waste bulbs.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's that are going to Marisol are kept with each manifested shipment. The PPC plan was in order including updates on all appropriate phone numbers. The source reduction strategy for both the residual and hazardous wastes were also made available. The residual and hazardous waste biennial reports were also completed. The hazardous and residual waste inspection logs were also made available and appeared to be completed. The hazardous waste personnel training records were also available for review. The company last did its training in December 2002 and will be doing the next one in early fall of 2003.

No violations were observed.

The results of this inspection were reviewed with and a copy of this report was left with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) William J. Gillan Date 9/24/03
Inspector Signature Aleta L. Finney Date 9/24/03
File name: Dupont (rpt) Page 6 of 6

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont Automotive ID Number PAD0002311884 Date August 22, 2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Dupont Automotive ID Number PAD002311884 Date August 22, 2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID 1171416Field Code 555122

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884
 Site Name: Dupont - Marshall Labs
 Address: 3500 Grays Ferry Avenue
Philadelphia, PA 19146
 Municipality: Philadelphia
 Responsible Official: John Weldon
 Person Interviewed: John Weldon
 Inspector: Aleta L. Finney
 eFACTS ID #: PF SF

Telephone #: 215-539-6629
 Operator Name: same
 Address: same
 County: Philadelphia
 Title: Environmental Coordinator
 Title: Environmental Coordinator
 Title: Solid Waste Specialist

Inspection Date: 8 /22 / 2002 Type: routine (1) No. of Violations: 0 Time: 2 pm

Waste Description: <u>Industrial Waste Water</u>	Waste Code: <u>P999</u>
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>DOTW</u>	
Location: _____	Type: _____
Amount Generated: <u>318 tons</u>	<u>lb./mo.</u>
Waste Description: <u>Contaminated Lab Trash</u>	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>Experimental Station - Dupont</u>	
Location: <u>Wilmington, DE</u>	Type: _____
Amount Generated: <u>~ 1000</u>	<u>lb./mo.</u>
Waste Description: <u>RCRA Empty Metal Cans</u>	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>Experimental Station - Dupont</u>	
Location: <u>Wilmington, DE</u>	Type: _____
Amount Generated: <u>~ 7,000</u>	<u>lb./mo.</u>
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	<u>lb./mo.</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Thursday, August 22, 2002

A large quantity residual waste and a large quantity hazardous waste inspection was conducted by Aleta L. Finney, Solid Waste Specialist with the Department. Present from the facility was John Weldon, Environmental Coordinator.

The inspection began with a tour of Building 250. This building stores the facility's hazardous and residual wastes. The wastes include solvents, lab packs, contaminated lab trash, RCRA empty containers and universal wastes. This area was unusually full due to the downtime of the incinerator at Dupont's Experimental Station located in Delaware. Mr. Weldon stated that they should again start taking waste down to that facility in one week. The drums and lab packs are stored on racked shelving and were inspected. They were all closed and labeled properly with the accumulation date, generator information and the words "hazardous waste". The oldest accumulation date seen on any of the drums was July 11, 2002. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump to collect any spilled material. The residual wastes were stored in wranglers (1 cubic yard containers) and drums. These were all labeled non-hazardous wastes.

Several of the satellite accumulation areas, including Processing Engineering and Dispersion Building, were inspected. These areas each had 2 drums of hazardous aqueous and non-aqueous wastes as well as contaminated plant trash. All drums were closed and properly labeled. There were also some drums that have been determined to be waste by the process area. There were 76 drums awaiting movement to hazardous waste storage area. This will be done by tonight or tomorrow.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's are kept with each manifested shipment. The PPC plan was in order including updates on all appropriate phone numbers. The source reduction strategy for both the residual and hazardous wastes were also made available. The residual and hazardous waste biennial reports were also completed. The hazardous and residual waste inspection logs were also made available and appeared to be completed. The hazardous waste personnel training records were also available for review. The company last did its training in May 2001 and will be doing the next one in November 2002. The chemical analyses for the residual waste were also completed and made available.

No violations were observed.

The results of this inspection were reviewed with and a copy of this report was left with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) John W. Weldon Date 8/22/02
Inspector Signature Aleta L. Finney Date 8/22/02
File name: Dupont (rpt) Page 6 of 6

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Friday, April 14, 2000

Aleta L. Finney and Cheri Niemeyer, Solid Waste Specialists with the Department conducted a follow-up inspection of Dupont Automotive-Marshall Labs. Present from the facility was John Weldon, Environmental Coordinator.

The violation noted in the previous inspection report was a source reduction strategy (SRS) that was not up-to-date. The SRS has now been completed and was sent to Mr. Calvin Ligons of this regional office. Correspondence from Mr. Weldon was received the same day as this inspection stating the same.

This violation has been corrected.

The results of this inspection were reviewed with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) copy mailed to facility Date 4/20/2000

Inspector Signature) Aleta L. Finney Date 4/19/2000

File name: Dupont Labs 4-14-2000.doc

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884
 Site Name: Dupont Labs - Marshall
 Address: 3500 Grays Ferry Avenue
Philadelphia, PA 19146
 Municipality: Philadelphia
 Responsible Official: John Weldon
 Person Interviewed: John Weldon
 Inspector: Aleta L. Finney
 eFACTS ID #: PF _____ SF _____

Telephone #: (215) 539-6629
 Operator Name: Same
 Address: Same
 County: Philadelphia
 Title: Environmental Coordinator
 Title: Environmental Coordinator
 Title: _____

Inspection Date: 8/23/2001 Type: Routine No. of Violations: 0 Time: 1:30pm

Waste Description: Industrial Waste Water Waste Code: R999

Treatment: ☐ Yes ☒ No Type: _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility POTW

Location: _____ Type: _____

Amount Generated: 318 Tons lb./mo.

Waste Description: Contaminated Lab Trash Waste Code: _____

Treatment: ☐ Yes ☒ No Type: _____

Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility Experimental Station - Dupont

Location: Wilmington, DE Type: _____

Amount Generated: _____ lb./mo.

Waste Description: RCRA Empty Metal Cans Waste Code: _____

Treatment: ☐ Yes ☒ No Type: _____

Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility Experimental Station - Dupont

Location: Wilmington, DE Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

EPA
Inspection Date 8/23/2001
Time Start 1:30 pm
Time Finish 4:30 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name Dupont Automotive I.D. Number PAD002311884
Site Address 3500 Grays Ferry Avenue
County Philadelphia Municipality Philadelphia Zip 19146
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official John Weldon, Environmental Coordinator
Person Interviewed John Weldon Telephone (215) 539-6117
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: ~125,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent Tubes, Lead-Acid Batteries

3. Hazardous Waste Transporters:

Transporter Name Marisol License Number NJD002454544Transporter Name Dupont Co, Inc License Number DED003930807

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, F005, D001	Toluene, Xylene	E.I. Dupont Co Inc.
D001, D035	Tetrahydrofuran	Rt 141 Experimental Station
D001, D002	Sodium Metabisulfite, Acrylic Acid	Wilmington, DE 19880
F003, F005, D035	Hazardous Waste Liquid (Aqueous)	DED003930807
D002	Potassium Hydroxide	Marisol Inc.
D002	Methacrylic Acid	125 Factory Lane
D001	waste resin solution	Middlesex, NJ 08846
D005	Barium Sulfate	NJD002454544

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont-Marshall Labs ID Number PA0002311884 Date August 23, 2001
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Dupont Labs - Marshall ID Number PAD002311884 Date August 23, 2001
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Thursday, August 23, 2001

A large quantity residual waste and a large quantity hazardous waste inspection was conducted by Aleta L. Finney, Solid Waste Specialist with the Department. Present from the facility was John Weldon, Environmental Coordinator and Linda Bjornson, Environmental Specialist.

The inspection began with a tour of Building 250. This building stores the facility's hazardous wastes. The wastes include solvents, lab packs and universal wastes. The drums are stored on racked shelving and were inspected. They were all closed and labeled properly with the accumulation date, generator information and the words "hazardous waste". The oldest accumulation date seen on any of the drums was July 8, 2001. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump to collect any spilled material. There was no residual waste stored here at this time as the facility had just had a pick-up of material.

Two labs were examined next. Both labs have 2 5-gallon pails for the accumulation of both aqueous and non-aqueous hazardous waste. They were closed and properly labeled. Any lab pack material is collected on a cart and taken to the 250 building for storage and packing.

The resin area was inspected next. There are two floors of production that occur in this building. Both floors contain a satellite accumulation area for both aqueous and non-aqueous wastes. The drums had funnels with lids in the bungees. All of these drums were properly labeled with the words hazardous waste.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's are kept with each manifested shipment. The PPC plan was in order with the exception of a couple of incorrect phone numbers. Mr. Weldon stated that this would be taken care of in a timely manner. The source reduction strategy for both the residual and hazardous wastes were also made available. The residual waste biennial report was also completed. The hazardous waste inspection logs were also made available and appeared to be completed. The hazardous waste personnel training records were also available for review. The company last did its training in May 2001.

No violations were observed.

A copy of this report was left with Mr. Weldon before leaving the facility.

RECOMMENDATIONS:

- 1) Crushing of fluorescent tubes should be discontinued promptly.
- 2) Update PPC plan phone numbers.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)

John W. Weldon

Date

8/23/01

Inspector Signature

Aleta L. Finney

Date

8/23/2001

File name: Dupont-Marshall Labs.doc

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/8/2000
Time Start 2:30 pm
Time Finish 4:30 pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name DuPont Automotive I.D. Number PAD002311684
Site Address 3500 Grays Ferry Avenue
County Philadelphia Municipality Philadelphia Zip 19146
Name of Inspector Aleta L. Finney
Name & Title of Responsible Official Victor Forte
Person Interviewed John Weldon Telephone ()
Mailing Address (if different from above)
Amount of Hazardous Waste Generated per Month: ~ > 50,000 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other PBR: ☐ Neutralization/WWTP ☐ Reclaim Other GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent Tubes, Lead Acid Batteries

3. Hazardous Waste Transporters:

Transporter Name Marisol License Number NJ DEP 2809Transporter Name EI Dupont Co., Inc License Number DE-HW-433Transporter Name License Number

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F005, F003,	xylene, toluene, MEK, acetone	Marisol Inc
D001, D035	tetrahydrofuran	125 Factory Lane
D009	waste flammable liquid	Middlesex, NJ 08846
	solid hazardous waste-filter media,	NJD 002454544
	paint + resin solids, glass, metal	EI Dupont Co., Inc
P028	plastic, waste benzyl chloride	Rt 141 - Experimental Station
D009	mercury	Wilmington, DE 19880
	styrene	DED 003930807

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont Automotive ID Number PAID002318664 Date 3/8/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		X		Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name DuPont Automotive ID Number PAD002311684 Date 3/6/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name DuPont Automotive ID Number PAD002311884 Date 3/8/2000
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
			✓	Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059
			✓				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name DuPont Automotive ID Number PAD662311884 Date 3/8/2000
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Containment Buildings (Subchapter T)			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Generator I.D. # PA DC 002311884

Telephone # (215) 539-6629

Site Name Dupont Labs-Marshall

Operator Name Same

Site Address 3500 Grays Ferry Avenue
Philadelphia, PA 19146

Address _____

Municipality Philadelphia

County Philadelphia

Responsible Official John Weiden

Title Environmental Coordinator

Person Interviewed John Weiden

Title Environmental Coordinator

Inspector Aleta L. Finney

Time 2:30 pm

Inspection Date

03/08/00

Inspection Type

01

Inspector I.D. #

211311

Violation

00

INSPECTION TYPE

01 Routine

04 Follow Up

07 Complaint

02 Spill Response

05 Sampling Only

08 Record Rev

03 Remedial Action

06 Ground Water

09 Other

Comment

ROUTINE INSPECTION

Waste Description: Industrial wastewater from spray paint booths Waste Code: _____

Treatment ☐ Yes ☐ No Type _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility City of Phila Water Department

Location 1100 Market St. Phila, PA Type _____

Amount Generated: 276 tons/yr

Waste Description: Contaminated lab trash Waste Code: _____

Treatment ☐ Yes ☒ No Type _____

Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location _____ Type _____

Amount Generated: 4500 lb./mo.

Waste Description: Metal cans Waste Code: _____

Treatment ☐ Yes ☒ No Type _____

Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location _____ Type _____

Amount Generated: 6200 lb./mo.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Generator Name Dupont Automotive
Date 3/6/2000

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed		2 = Not Applicable		3 = Not Determined		4 = Non-Compliance	
Chapter Citation	Requirement	Status				Line Number	
25 Pa Code	GENERAL PROVISIONS	1	2	3	4		
287.6	Designated facility: valid permit? Permit Number (PA) <u>D00231884</u>					3001	
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	X				3002	
287.53	Written source reduction strategy on file and in effect.	X				3003	
287.53(b)	Waste reduction strategy covers all waste streams.	X				3004	
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	X				3005	
287.54	Waste analysis performed: copy on file.	X				3006	
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X				3007	
287.55	Small quantity generator record keeping requirements.		X			3008	
287.101(a)	Operation of disposal or processing facility without a permit.		X			3009	
	STORAGE REQUIREMENTS						
299.111(1)	Residual waste not mixed with hazardous waste.	X				3010	
299.111(2)	Waste stored as not to create a safety risk.	X				3011	
299.111(3)	Residual waste not mixed with special handling waste.	X				3012	
299.111(4)	Waste not blown or otherwise deposited outside storage area.	X				3013	
299.112(c)	Storage area inspected; records available.	X				3014	
299.113(a)	All waste stored less than one year.	X				3015	
299.114(a)	Equipment maintained in operable condition.	X				3016	
299.114(c)	Equipment cleaning frequencies maintained.	X				3017	
299.115	Vectors controlled and public nuisances prevented.	X				3018	
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019	
299.116(c)	Waste stored to prevent groundwater degradation.	X				3020	
299.121	Sufficient number of properly constructed storage containers.	X				3021	
299.122	Storage tank design standards.		X			3022	
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.	X				3023	
299.131	Waste storage pile area properly designed, constructed and maintained.		X			3024	
299.132	Storage pad or liner system properly designed and maintained.		X			3025	
299.133	Proper design and maintenance of leachate and runoff control systems.		X			3026	
299.151	Proper storage and containment of incinerator ash residue.		X			3027	
299.152	Proper storage and containment of friable asbestos containing waste.		X			3028	
299.153	Proper storage and containment of coal ash.		X			3029	
299.154	Proper storage and containment of PCB containing waste material.		X			3030	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs
Identification Number: PAD002311884
Date of Inspection: Wednesday, March 8, 2000

A residual waste and large quantity hazardous waste generator inspection was conducted by Aleta L. Finney of the Department. Present from the facility was John Weldon, Environmental Coordinator and Victor Forte, Environmental Specialist.

Dupont-Marshall Labs is a research and development facility that creates paints. The Process Engineering area includes the laboratories, 2 resin buildings and a dispersion building. The laboratories design the paints. Three labs were inspected. Each lab contained two 5-gallon containers—one for aqueous and one for non-aqueous solutions. Each container was labeled hazardous waste and was lidded. The lab also produces residual wastes including contaminated lab trash (PPE, respirators, and pipettes) and metal cans (1/16 – 5-gallon).

There are also 6 satellite accumulation areas in the 2 resin buildings and the dispersion building. The resin buildings are where the pigments are created in large quantities. In the resin areas, 1 drum of Methyl Ethyl Ketone (MEK) and acetone, a second drum of MEK, toluene and xylene and a third of filter media were observed on each floor. There is a holding area outside of the 2 resin buildings where the full satellite drums are placed until they go into main storage. These drums are picked up on a daily basis. In the dispersion area, the pigments are evenly dissolved throughout the paint. A drum of MEK and acetone and another of MEK, toluene and xylene were both open because material was being actively added. Both were properly labeled.

Building 250 was then inspected. This building houses the facility's main storage area for both hazardous and residual wastes. Universal wastes and product are also stored here. Batteries, fluorescent bulbs, contaminated lab trash metal cans and hazardous waste drums are examples of the wastes that are stored here. The wastes are stored on racked shelving. The drums if hazardous wastes contained the same contents as those stored in satellite accumulation. The oldest accumulation date seen on any of the drums was February 2, 2000. All were properly labeled and in good condition. Secondary containment was present and the floor drains were clean. These drains connect to a sump to collect any spilled material. Lab pack material is also placed here and packaged in a smaller room next to the storage area.

Finally the paperwork was examined. Manifests were completed correctly and return copies were available. The facility takes a picture of each load and profiles it before shipment and LDR's are kept with each manifested shipment. Hazardous waste shipments are made from the facility almost weekly and residual waste shipments leave about every week to ten days. Both the residual and hazardous waste source reduction strategies were made available. However, the hazardous waste source reduction strategy was last completed in February 1992. This is contrary to §262a.100. Source reduction strategies should be updated every 5 years or when there is a change in the process. Mr. Weldon was sent 2

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) copy mailed to facility Date 3/29/00
Inspector Signature Aleta L. Finney Date 3/28/00
File name: Dupont Labs Page 8 of 9

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, March 8, 2000

booklets of the source reduction strategy so that this update could be completed. Mr. Weldon informed me that a completed, up-to-date source reduction strategy would be available in about a month from this inspection. Residual and hazardous waste biennial reports were also examined and complete. The PPC plan was also reviewed and was well-written. It was in the process of being updated and is updated annually. Annual personnel training records are also kept onsite. Inspection records of the main storage area were also complete.

One violation was observed.

The results of this inspection were reviewed with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Person Interviewed (Signature) Copy mailed to facility Date 3/29/00

Inspector Signature Aleta L. Finney Date 3/26/00

File name: Dupont Labs

Page 9 of 9



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date AUG 28, 98
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name DuPont Automotive I.D. Number PA0002311884
Site Address 3500 Grays Ferry Ave
County Phila Municipality Phila ZIP 19146
Name of Inspector Paul Arnold
Name & Title of Responsible Official William Gillow
Person Interviewed Victor Forte Telephone (215) 339-6117
Mailing Address (if different from above) same
Amount of Hazardous Waste Generated per Month: ~100,000 Pounds 2 Kgs PLR

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☒ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Mansol License Number UJ0002454544
Transporter Name Dupont License Number DE0003930807
Transporter Name Ross License Number OH0048415665

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
	Organic Solvents, Paints, Inks	Ross Incineration
	Shut Resins	OH0048415665
	DuPont pure	Dupont
		PA0002385738
		Mansol
		UJ0002454544

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Deport Automotive ID Number PA0000311884 Date AUG 28, 98
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT**CHAPTER CIT.****LINE**

					CONTAINERS (Subchapter I)	
X					Containers managed in compliance with Chapter 265 Subchapter I	262.34 H025
X					Containers of hazardous waste in good condition	265.171 H026
X					Containers and stored waste compatible	265.172 H027
X					Containers kept closed except during addition or removal of wastes	265.173 H028
X					Containers managed to prevent leaks	265.173(b) H029
X					Containers labeled to accurately identify contents	265.173(c) H030
X					Container storage areas inspected at least weekly	265.174 H031
X					Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177 H032
X					Proper containment and collection systems in place	265.178(a)-(d) H033
X					All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e) H034
X					Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2) H035
						H036
						H037
						H038
					TANKS (Subchapter J)	
X					Tanks labeled "Hazardous Waste"	262.34(a)(4) H039
X					Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192 H040
X					Secondary containment provided for tanks (systems) as required	265.193 H041
X					Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194 H042
X					Tanks labeled to accurately identify contents	265.194(d) H043
X					Required inspections completed and documented in operating log	265.195 H044
X					Release reported to Department within 24 hours, unless exempted	265.196 H045
X					Special requirements for ignitable and reactive wastes followed	265.198 H046
X					SQ Generator complies with 265.201	262.34(e)(3) H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name DePax Automotive ID Number PH000311884 Date AUG 28, 98
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT**CHAPTER CIT.****LINE**

				Containment Buildings (Subchapter T)		
X				Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
X				Meets special requirements if liquids present	265.521(b)	H049
X				Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
X				Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
X				Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
X				No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
X				Professional engineer's certification placed in operating record	265.521(d)(2)	H054
X				Required inspections performed and logged in operating record	265.521	H055
						H056
						H057
						H058
						H059
				Drip Pads (Subchapter S)		
X				Engineer's certification of existing drip pads on file	265.501	H060
X				Drip pad meets 265.503 design & operating standards	265.501	H061
X				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
X				(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
X				Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
X				Drip pads & collection systems designed to prevent run off	265.503(d)	H065
X				Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
X				Release reporting requirements met	265.503(m)	H067
X				Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
						H069
						H070
						H071
						H072
						H073

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT
INSPECTION REPORT COMMENTS

Date of inspection Aug 28, 1998 Identification Number PAD002311884

Company/Facility/Site Name DuPont Automotive

A hazardous waste inspection was conducted by Paul Arnold of the Department. Victor Forte, Environmental Specialist, was the facility guide. DuPont Automotive generates large amounts of waste organic solvents, paints, inks, and resins (~100,000 lbs/month). These wastes are generated through various research and development activities.

Hazardous wastes, which are generated in various labs throughout the plant, are transported to a hazardous waste containment building. The hazardous waste containment building was secured and had secondary containment. The containers were properly labeled. Hazardous waste is transported by Marisol (NJD002454544), DuPont (DED003930807), and by Ross (OHD48415665) to each of their respective facilities.

Hazardous waste manifests were made available and were properly completed.

A PPC plan, personnel training and source reduction strategy were reviewed and were current.

-----NO VIOLATIONS OBSERVED-----

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Mailed to facility

Date AUG 31, 98

Inspector (signature) [Signature]

Date AUG 31, 98



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/12/98
Time Start 11:50am
Time Finish 1:15pm

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name Dupont - Marshall Lab I.D. Number PA0002311884
Site Address 3401 Grays Ferry Avenue
County Philadelphia Municipality Philadelphia ZIP 19146
Name of Inspector Chris Smolar
Name & Title of Responsible Official John G. Welden Environmental Coordinator
Person Interviewed " Telephone (215) 339-6629
Mailing Address (if different from above) "
Amount of Hazardous Waste Generated per Month: 149,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other Waste Wrangler
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types Fluorescent Tubes, Car/Truck Batteries,

3. Hazardous Waste Transporters:

Transporter Name Du Ponts Experimental Station License Number _____
Transporter Name Phillip Environmental License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>F003, F005, D001</u>	<u>Mixed Solvents</u>	<u>Petro Chem, MI, Neutral</u>
<u>F003, F005, D001</u>	<u>Other flammable solvents/paints</u>	<u>"</u>
<u>F003, F005, D001</u>	<u>Solid Waste (flammable)</u>	<u>"</u>
<u>F003, F005, D001</u>	<u>Contaminated Trash</u>	<u>Petro Chem, MI</u>
<u>F003, F005</u>	<u>Aqueous waste liquid</u>	<u>"</u>
<u>D001</u>	<u>H-724 - NNP</u>	<u>"</u>
<u>D001</u>	<u>Tetrahydrofuran</u>	<u>"</u>
<u>D001</u>	<u>Special Resins and Monomers</u>	<u>"</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Dupont-Marshall Lab ID Number PAD002311884 Date 1/12/98
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify contents	265.173(c)	H030
X				Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
X				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
X				Secondary containment provided for tanks (systems) as required	265.193	H041
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
X				Tanks labeled to accurately identify contents	265.194(d)	H043
X				Required inspections completed and documented in operating log	265.195	H044
X				Release reported to Department within 24 hours, unless exempted	265.196	H045
X				Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Dupont - Marshall ID Number PAD00234684 Date 1/12/98
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				Containment Buildings (Subchapter T)		
	X			Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
	X			Meets special requirements if liquids present	265.521(b)	H049
	X			Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
	X			Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
	X			Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
	X			No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
	X			Professional engineer's certification placed in operating record	265.521(d)(2)	H054
	X			Required inspections performed and logged in operating record	265.521	H055
						H056
						H057
						H058
						H059
				Drip Pads (Subchapter S)		
	X			Engineer's certification of existing drip pads on file	265.501	H060
	X			Drip pad meets 265.503 design & operating standards	265.501	H061
	X			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
	X			(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
	X			Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
	X			Drip pads & collection systems designed to prevent run off	265.503(d)	H065
	X			Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
	X			Release reporting requirements met	265.503(m)	H067
	X			Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
						H069
						H070
						H071
						H072
						H073

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 1/12/98 Identification Number PAD002311884
Company/Facility/Site Name Dupont - Marshall Lab

A routine inspection was conducted at the Dupont Marshall Lab. Present during the inspection were Chris Smolar, Dave Burke, and John Tissue of the Department, and John G. Weld, and Personnel of Dupont Marshall Lab.

The inspection began in the 250 building. This building is used to store products and wastes. The types of wastes stored here include batteries, fluorescent tubes, lab packs, and drums of hazardous waste. The drums were inspected. They appeared to be in good condition. The drums and lab packs were properly labeled. All drums and lab packs have been stored less than 90 days. The oldest accumulation date seen was 12/10/97.

The 250 building has floor drains and a sump. The floor drains were free of clogs and obstructions. The building has a containment area for spilled material.

The Process Engineering building was examined next. Here the paints created in individual laboratories are produced in larger quantities in preparation for mass production. Wastes here are accumulated in satellite storage areas. Full drums are taken to the 250 building. No full drums were seen in this building. All drums were properly labeled. Drums having funnels in the bung hole had lids over the funnels.

Next, the laboratory building was inspected. Here the paints are designed. Individual laboratories have lab pack containers for storing hazardous waste. The containers are labeled and kept lidded.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Sent to Facility Date 1/14/98
Inspector (signature) Christopher Smolar Date 1/12/98

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 1/12/98 Identification Number PAD002311884
Company/Facility/Site Name Dupont - Marshall Lab

Finally, the paper work was examined. The hazardous waste manifests, RCRA training records, and PPC plan were examined. All appear to be in order.

No violations were observed.

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Person interviewed (signature) Sent to Facility Date 1/14/98
Inspector (signature) Christopher Amolan Date 1/12/98

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 1/2/97 Time start 11:16 am Time finish 12:30 pm
Name of Inspector Chris Smiler
Company, installation name Dupont E. I. De Nemours & Co Inc.
Location 3421 Grays Ferry Avenue, Phila, PA 19156
County Philadelphia Municipality Phila.
Identification number PAD002311884
Name of responsible official William Gillan
Title Safety, Health, and Medical Manager
Mailing Address Same as above
Area code and telephone number (215) 339-6552
Name of person interviewed —
Title —
Mailing address (if different from above) —
Area code and telephone number —

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☒ treatment, ☐ storage, ☐ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. 100,000 lbs ~~kg~~ /mo.
b. — kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F003, F005, D001	Nortrec Resources	Detroit, MI
	Petrochem	Detroit, MI
	Du Pont Co Chambers Works	Deepwater, NJ
	Du Pont Experimental Station	Wilmington, DE
	Chem Harbors	Cincinnati, Baltimore, Natick
	Kellogg Env. Services	Bridgeport, NJ

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Dupont Company ID Number PAD 062311884 Date 1/2/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 1/2/97 Identification Number PAU 00311 884
Company/Facility/Site Name Dupont E. I. De Nemours Inc. (Marshall Labs)

A routine inspection was conducted at the above referenced facility. Present during the inspection were Chris Smoler of the Department and William Gillon and two other representatives of Dupont Automotive.

This facility is a lab which develops automobile paints. The facility consists of labs which develop the paint, and then a semi-works which develops and engineers the process of making the paint. The paints are those used in the repair of auto finishes.

Several labs were examined. All containers of hazardous waste in the labs are labelled. The wastes are mostly MEK, Acetone, Xylene, toluene, and other flammable organic solvents.

The satellite accumulation areas were examined. All drums were properly labelled. Only one less than full drum of each waste stream is in each area.

The 90 day drum storage area was inspected—all drums were labelled properly and had accumulation dates of 12/15/96 or later.

The paperwork was checked and found to be in order. No violations were observed. All previous violations are corrected.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Sent to facility Date 1/6/97
Inspector (signature) Christopher Smoler Date 1/2/97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 5/20/96 Time start 10:00 Time finish _____
Name of Inspector Mary Alice Risse
Company, installation name E.I. DuPont Co Inc. Marshall Laboratory
Location 3401 Gray's Ferry Avenue, Phila, PA 19156
County Phila Municipality Phila
Identification number PAD 002311884
Name of responsible official William Gillian
Title Manager: Safety, Health + Medical
Mailing Address _____
Area code and telephone number 215-339-6213
Name of person interviewed same
Title _____
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- | | | | | |
|---|--|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 100,000 lbs kg/mo.
b. _____ kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>Foo3, Foo5, Doo1</u>	<u>Nortus Resources</u>	<u>Detroit, MI</u>
	<u>Petiochem</u>	<u>Detroit, MI</u>
	<u>DuPont Co Chambers Works</u>	<u>Deepwater, NJ</u>
	<u>DuPont Experimental Station</u>	<u>Wilmington, DE</u>
	<u>CleanHaulers</u>	<u>Cincinnati, Baltimore, Natick</u>
	<u>Rollins Env. Services</u>	<u>Bridgeport, NJ</u>

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Marshall Laboratory ID Number PAD 002311884 Date 5/20/96

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
			X	Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection May 20, 1996 Identification Number PAD002311884Company/Facility/Site Name E.I. DuPont Co. Inc. Marshall Laboratory

This inspection is followup to an EPA inspection done in response to the Southwest Philadelphia Initiative Project. The facility does research to produce after market automotive paints. Research on resins and polymers are done in order to create the best paint. 100-200 gallon batches of paint are also manufactured. Most of the hazardous waste that is generated is flammable. There are two areas which generate hazardous waste. These are the Engineering Process Area, and the Labs. The waste is then taken to Building 250 which is used to store hazardous waste, as well as flammable product.

The Engineering Process Area uses satellite accumulation areas to accumulate the waste. It takes two to three days to fill a drum with waste and then the drum is marked with an accumulation date and sent to building 250. There are four satellite areas. Each drum contains a different type of waste, they are not mixed.

Building 250 is the hazardous waste storage area. The drums and containers are stored on shelves which are access with a forklift. The shelves reach to the ceiling. The facility should take care that the hazardous waste labels are facing outward, and visible for inspection. The building contains a sprinkler system, and secondary containment.

The labs each generates small quantities of hazardous waste in aqueous and non-aqueous forms. Both of these waste streams are collected in 5 gallon pails in each laboratory. When the pails are full, the waste is taken to building 250 where it is drummed and stored until the waste is shipped offsite. The pails in the laboratory did not have hazardous waste labels on them. This is a violation of § 262.30(3). The facility should label these containers with the appropriate hazardous waste label.

Manifests and quarterly reports were inspected and no problems were found. The waste is shipped off of the site approximately every two weeks to a variety of different TSD facility's, all of which are out of state.

One (1) violation observed. MAR

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) sent to facilityDate 5/30/96Inspector (signature) Mary Alice ReusseDate 5/30/96



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
May 29, 1996

Southeast Regional Office

610-832-6212
Fax 610-832-6143

NOTICE OF VIOLATION

Mr. William Gillan
E.I. DuPont Company, Inc.
Marshall Laboratory
3401 Gray's Ferry Avenue
Philadelphia, PA 19156

Re: Hazardous Waste Inspection
Marshall Laboratory
PAD002311884
Philadelphia

Dear Mr. Gillan:

As a result of the Department's May 20 inspection at Marshall Laboratory, 3401 Gray's Ferry Avenue, Philadelphia, the Department believes that Marshall Laboratory is in violation of the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq. ("CSL"); Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71.A § 510-17 ("Administrative Code"); and the Rules and Regulations promulgated thereunder, as follows:

A. Marshall Laboratory failed to label containers of hazardous waste with an appropriate hazardous waste label. There are small containers of hazardous waste in the in the labs which are not marked with a hazardous waste label. This is contrary to § 262.30(3).

The Department believes that the activities and conditions described in paragraph A above constitute a public nuisance pursuant to Section 601 of the SWMA, P.S. 35 § 6018.601 and Section 1917-A of the Administrative Code, P.S. § 510-17 and constitute unlawful conduct pursuant to Sections 6018.610(1), 6018.610(2), 6018.610(4) and 6018.610(9) of the SWMA, 35 P. S. §§ 6018.610(1), 6018.610(2), 6018.610(4) and 6018.610(9), and Section 611 of the CSL, 32 P.S. § 691.611.

In order to achieve compliance with the SWMA, CSL, and the Administrative Code, the implementation of the following is suggested:

1. All containers of hazardous waste should be labeled with an appropriate hazardous waste label with the information given in § 262.30(3).

The Department suggests that Marshall Laboratory submit to the Department within fifteen (15) days of receipt of this Notice of Violation a written report addressing the circumstances under which

these violations occurred, a proposed program and schedule for the abatement of these violations and a proposal to prevent their recurrence.

This letter does not impose any obligation upon Marshall Laboratory and shall not be construed as an appealable action or adjudication of the Department of Environmental Protection.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

If you have any questions concerning this matter, please feel free to contact this office at the above number.

Sincerely,

A handwritten signature in cursive script, reading "Mary Alice Reisse".

Mary Alice Reisse
Waste Management Specialist
Waste Management

Re 30 (AM)150-8